

CHANGES TO THE 2001 HAZARDOUS WASTE REPORT

The EPA has made significant modifications to the Hazardous Waste Report for the 2001 collection based on a lengthy study of the information needs of the EPA and State hazardous waste programs. These changes are meant to improve the consistency, accuracy, and reliability of the data, while slightly reducing sites' reporting burden. These modifications include:

- # Replacing the Identification and Certification Form (Form IC) with a new form: the Site Identification Form;
- # Clarifying the types of hazardous wastes to be reported;
- # Streamlining the Hazardous Waste Report's Source, Origin, Form, and System Type codes; and
- # Removing Point of Measurement, Standard Industrial Classification (SIC) code, and Off-site Availability data elements from the Hazardous Waste Report.

These modifications to the 2001 Hazardous Waste Report are described further in the following paragraphs and summarized in the table on page 3.

Replacing the Identification and Certification Form (Form IC) with the Site Identification Form. For the 2001 Hazardous Waste Report, the EPA has replaced the 1999 Form IC with the Site Identification (ID) Form. In the past, basic site information (e.g., information on hazardous waste handling activities taking place at RCRA-regulated sites) was collected on three different forms, each with its own instructions and definitions. This sometimes gave regulators conflicting information about the same site, and was burdensome for respondents. Specifically, large quantity generators (LQGs) and treatment, storage and disposal facilities (TSDFs) reported site information for the Hazardous Waste Report (EPA Form 8700-13A/B) on the Form IC. Basic site information was also collected from all RCRA-regulated facilities on the Notification of Regulated Waste Activity form (EPA Form 8700-12). Finally, TSDFs seeking a permit or permit renewal submitted site information on the RCRA Hazardous Waste Part A Permit Application (EPA Form 8700-23).

The new Site ID Form standardizes the RCRA site information that was collected on these three forms. This means that, after you have submitted the Site ID Form once, you can just attach a copy of the previously submitted Site ID Form (with any changes) when site identification information is requested again. Each site required to submit the 2001 Hazardous Waste Report must submit a completed Site ID Form as a component of the Report.

Clarifying the Types of Hazardous Wastes to be Reported. The 2001 Hazardous Waste Report instructions clarify that generators should generally report only the hazardous wastes that count toward the determination of their generator status. This includes wastes that are generated, accumulated, and subsequently managed on site or shipped off site. TSDFs should report hazardous waste received from off site, the management of the hazardous waste while on site, and any shipments of hazardous waste off site.

In addition, sites should not report hazardous waste exports as part of their Hazardous Waste Report submission. (Note that primary exporters of hazardous waste are currently required to file an Annual Report on their exports under 40 CFR 262.56.) Importers of hazardous waste must complete a Waste Generation and Management Form (Form GM) and use the appropriate code to identify that the waste was imported from a foreign country.

Streamlining the Hazardous Waste Report's Source, Origin, Form, and System Type Codes. The Source codes in the 2001 Hazardous Waste Report have been consolidated, regrouped, and merged with the Origin codes. The new Source codes are now mandatory. Origin codes have been eliminated altogether. This new coding scheme reduces the number of codes from 60 to 30 and the number of code groups from seven to six.

In addition, the Form codes have been revised and streamlined. The new coding scheme reduces the number of Form codes from 89 to 47 with seven high-level code groups.

Finally, the EPA has replaced System Type codes with Management Method codes. This new coding scheme reduces the number of codes from 65 to 28 and the high-level code groups from 14 to four. It also eliminates overlap with Form codes.

Removing Point of Measurement, Standard Industrial Classification (SIC) Code, and Off-Site Availability Data Elements from the Hazardous Waste Report. The Point of Measurement data element on the 1999 Form GM consisted of four codes showing whether the waste being reported was mixed with other wastes prior to being measured. We determined that there is no significant need for this information. Additionally, because the Point of Measurement was confusing to respondents, the data were often of questionable quality. Thus, the Point of Measurement was eliminated from Form GM.

In addition, we removed the SIC code from Form GM, since we added the North American Industry Classification System (NAICS) codes (the replacement for the SIC codes) to the Site ID Form. Completion of the NAICS codes on the Site ID Form is mandatory.

The Off-site Availability code on the 1999 Form GM showed whether an off-site facility was a commercially-available TSDF, or if it was only permitted to accept wastes from firms owned by the same company. The EPA did not find any need for this information. Thus, the Off-site Availability code was eliminated from Form GM.

HIGHLIGHTS OF CHANGES TO THE 2001 HAZARDOUS WASTE REPORT

- # Replaced the Form IC with the Site ID Form. All sites required to file a 2001 Hazardous Waste Report must submit a Site ID Form as a component of the 2001 Report.
- # Clarified that sites generally need only report on Form GM those hazardous wastes that were included in determining their generator status.
- # Clarified that sites should not report their hazardous waste exports in their 2001 Hazardous Waste Report submissions. (Primary exporters are already required to submit an Annual Report on their hazardous waste exports under 40 CFR 262.56.)
- # Clarified that importers of hazardous waste must submit a Form GM and use the appropriate code to identify that the waste was imported from a foreign country.
- # Developed a revised set of Source codes, which are now mandatory on Form GM. Origin codes are no longer reported.
- # Developed simplified Form codes.
- # Replaced System Type codes with Management Method codes. The new coding scheme eliminates overlap with Form codes and provides a simpler coding structure than System Type codes.
- # Eliminated Point of Measurement, SIC code, and Off-site Availability data elements from the Form GM.